

IN THE UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

HOLCOMBE, et. al,

Plaintiffs

vs.

UNITED STATES OF  
AMERICA,

Defendant

NO. 5:18-CV-00555-XR

(consolidated cases)

**PLAINTIFFS' SECOND AMENDED DESIGNATION OF  
REBECCA METCALF<sup>1</sup>**

Plaintiffs file the following deposition designation of Rebecca Metcalf and hereby designate the following pages and lines of the referenced deposition to be used at trial. Plaintiffs do not include in their designations any objections or attorney commentary that may fall within the page and line references.

The official transcript pages of the proffered testimony, including the cover page and certification page, are attached hereto as Plaintiffs' Trial

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<sup>1</sup> For the Court's and opposing counsel's convenience, Plaintiffs note that upon reviewing the amended designation, they discovered there was an offer at 51:7-51:15 that was inadvertently inserted from another Plaintiff's designation. The offer did not appear in the attached PEX 931 and was simply a typographical mistake in the designation pleading. Accordingly, that offer has been deleted herein. No other changes have been made to the previous designation.

Deposition Testimony of Rebecca Metcalf

Exhibit (PEX) 931, which is incorporated herein by reference. The portions of the testimony that are not being offered have been redacted.

***Plaintiffs note that there is also a video of this deposition testimony being offered in conjunction with this designation, which will be submitted separately to the Court as PEX 938.***

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
6:17-7:3	<p>Pg 6</p> <p>17 Q. Ms. Metcalf, can you please state your name for</p> <p>18 the record.</p> <p>19 A. Rebecca Metcalf.</p> <p>20 Q. Do you have a middle name, ma'am?</p> <p>21 A. Yes, sir. Lea.</p> <p>22 Q. L-E-E?</p> <p>23 A. L-E-A.</p> <p>24 Q. L-E-A, okay.</p> <p>25 And what is your date of birth?</p> <p>Pg 7</p> <p>1 A. [Redacted], 1981.</p> <p>2 Q. And you are a plaintiff in this matter?</p> <p>3 A. Yes, sir.</p>		
16:11-16:13	<p>Pg 16</p> <p>11 Q. All right. How are you related to</p> <p>12 Robert Braden, if at all?</p> <p>13 A. He's my brother.</p>		
16:21-17:9	<p>Pg 16</p> <p>21 Q. Okay. What about Debra Braden?</p> <p>22 A. That's my mother.</p> <p>23 Q. And Keith Braden?</p> <p>24 A. My father.</p> <p>25 Q. Okay. Are you related by blood or marriage to</p> <p>Pg 17</p> <p>1 any other victim of the shooting in Sutherland Springs</p> <p>2 at the church on November 5th, 2017?</p> <p>3 A. Z[Redacted].</p>		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	4 Q. Okay. And she's your niece?		
	5 A. Yes, sir, that's correct.		
	6 Q. And who are her parents?		
	7 A. Elizabeth Braden and John Zavala.		
	8 Q. And Elizabeth is your sister?		
	9 A. Yes, sir.		
19:11-19:24	Pg 19		
	11 Where were you born?		
	12 A. In San Antonio.		
	13 Q. And what's your date of birth?		
	14 A. [Redacted], 1981.		
	15 Q. Did you grow up in San Antonio?		
	16 A. Until I was about three.		
	17 Q. Do you remember where you moved when you were		
	18 three?		
	19 A. Germany.		
	20 Q. What was the reason for the move to Germany?		
	21 A. Because Keith was military and he was stationed		
	22 in Germany.		
	23 Q. I'm sorry. Because who?		
	24 A. Keith, my dad.		
20:3-20:25	Pg 20		
	3 Q. Okay. How old were you when he left --		
	4 He was in the Air Force. Is that correct?		
	5 A. No, sir, he was Army.		
	6 Q. Okay. I'm sorry. How -- how long -- how old		
	7 were you when he left the Army, do you remember?		
	8 A. I believe I was in eighth grade.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	9 Q. After he left the Army, where did y'all move		
	10 to?		
	11 A. La Vernia.		
	12 Q. I'm sorry?		
	13 A. La Vernia, Texas.		
	14 Q. Okay. Do you know why you were moved there?		
	15 A. Because that's where my grandmother lived.		
	16 Q. Was that your father's mother or your mother's		
	17 mother?		
	18 A. My mother's mother.		
	19 Q. Did you go to school in La Vernia?		
	20 A. Yes, sir.		
	21 Q. What school did you go to?		
	22 A. La Vernia Junior High and La Vernia High		
	23 School.		
	24 Q. And you graduated from La Vernia High School?		
	25 A. That's correct, yes.		
22:4-22:7	Pg 22		
	4 Q. Did you have any children of that marriage?		
	5 A. Yes, sir, two children.		
	6 Q. Two children. And what are their names?		
	7 A. Corbin Felsinger.		
22:12-22:17	Pg 22		
	12 Q. And what is his date of birth?		
	13 A. [Redacted]00.		
	14 Q. And your other child?		
	15 A. Danny.		
	16 Q. And their date of birth?		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	17 A. [Redacted], 2002.		
24:18-25:2	Pg 24 18 Q. And why I did you move to Seguin? 19 A. For a job. 20 Q. All right. And what job was it? 21 A. Akin Ambulance. 22 Q. And what'd you do for them? 23 A. Worked EMS. 24 Q. Okay. You were a certified EMS? 25 A. Yes, sir. Pg 25 1 Q. Where did you get your certification from? 2 A. Through La Vernia EMS.		
26:10-26:11	Pg 26 10 Q. Okay. What's your third child's name? 11 A. C[Redacted].		
26:14-26:15	Pg 26 14 Q. What's his date of birth? 15 A. [Redacted], 2002.		
26:20-26:21	Pg 26 20 A. I gave you the wrong date of birth. It's 2005 21 is his birth date.		
31:20-31:22	Pg 31 20 Q. Okay. Do you remember when you started at 21 La Vernia EMS the second time? 22 A. I honestly don't recall, no.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
32:1-32:4	<p>Pg 32</p> <p>1 Q. You indicated you worked there until after the</p> <p>2 shooting. Do you know what date you stopped working</p> <p>3 there?</p> <p>4 A. It was officially two days after the shooting.</p>		
32:13-32:21	<p>Pg 32</p> <p>13 So did you respond to the shooting as an</p> <p>14 EMS?</p> <p>15 A. Not on an ambulance, no.</p> <p>16 Q. Okay. When you say "not on an ambulance," what</p> <p>17 do you mean?</p> <p>18 A. My personal vehicle.</p> <p>19 Q. Oh, okay. So you -- so you went over there to</p> <p>20 provide what assistance you could?</p> <p>21 A. Correct.</p>		
33:6-33:17	<p>Pg 33</p> <p>6 Q. Okay. All right. And when they shut down,</p> <p>7 what did you do for a living?</p> <p>8 A. I have not worked since then.</p> <p>9 Q. Why is that?</p> <p>10 A. Because I don't want to go back to EMS.</p> <p>11 Q. Okay.</p> <p>12 A. Mentally I can't.</p> <p>13 Q. All right. Mentally you can't go back to work</p> <p>14 or you can't go to work as an EMS?</p> <p>15 A. I can't go back to working 911 --</p> <p>16 Q. Okay.</p> <p>17 A. -- EMS.</p>		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
33:24-33:25	Pg 33 24 What does your husband do for a living? 25 A. He's a paramedic.		
39:15-39:18	Pg 39 15 Okay. So I want to talk about the day of 16 the shooting, November 5th, 2017. Were you a member of 17 the church? 18 A. I was a member but not an active member.		
40:6 (beginning with "How often")-40:8	Pg 40 6 ..... How often did your parents go 7 to church? 8 A. Almost every weekend.		
40:12 (beginning with "Did your parents")- 40:22	Pg 40 12 ..... Did your parents have a regular recurring 13 role in the church? 14 A. My mother did some. 15 Q. Okay. What about your dad? 16 A. Not that I recall. 17 Q. All right. How did you initially find out 18 about the shooting? 19 A. A friend of mine that goes to church there 20 called me. 21 Q. Who is that? 22 A. Rickey Mercer.		
41:1-41:3	Pg 41 1 Q. And what did Mr. Mercer tell you? 2 A. That there was a shooting at the church and he		



## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	3 wanted to know if I was there.		
41:25-42:1	Pg 41 25 Q. All right. So what did you do after the call? Pg 42 1 A. Went up to the church.		
42:8-42:11 (ending with “not on duty.”)	Pg 42 8 Q. Okay. Where were you? 9 A. At the EMS station. 10 Q. So you were volunteering that day? 11 A. No, sir, I was not on duty.....		
44:9-44:14	Pg 44 9 Q. When you arrived, just kind of tell me about 10 the scene. Had it already been cordoned off? Were 11 people still going in and out? What was going on? 12 A. There were people still going in and out of the 13 church. They were still -- EMS was still getting 14 patients to transfer to the hospitals.		
44:18-44:20	Pg 44 18 Did your husband respond to the call to the 19 church? 20 A. Yes, sir.		
44:24-45:11 (ending with “Julie.”)	Pg 44 24 Q. Okay. So the ambulances had arrived prior to 25 your -- your arrival and they were attending to the Pg 45 1 people there. 2 A. Yes, sir.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	3 Q. Did you go help them?		
	4 A. I was stopped when I got to the front of the		
	5 church.		
	6 Q. Okay. And who stopped you?		
	7 A. One of the members of the church who knew me		
	8 and knew my family.		
	9 Q. And who was that?		
	10 A. I'm drawing a blank on her --		
	11 Julie. ....		
45:16-45:23	Pg 45		
	16 Q. And at that point where were -- were there EMS		
	17 kind of inside and outside the church or were they all		
	18 inside the church?		
	19 A. Both.		
	20 Q. Okay. And what did Julie tell you?		
	21 A. That my mother and Z[Redacted] had already been taken		
	22 to the hospital, she did not know where my brother was		
	23 and that my dad did not make it.		
46:2-47:16	Pg 46		
	2 Q. What -- after you spoke to Julie, what did you		
	3 do?		
	4 A. I saw my brother and I spoke with him.		
	5 Q. What did he tell you?		
	6 A. And he told me that Dad didn't make it.		
	7 Q. Did he tell you about your mother and Z[Redacted]?		
	8 A. He just knew that they were shot a lot.		
	9 Q. But he didn't know where they were or what		
	10 their condition was?		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
11	A. He didn't know. He just knew that they were		
12	taken by ambulance.		
13	Q. Okay. All right. So what did you do after		
14	that?		
15	A. Somebody from EMS came and got my brother to		
16	take him to get checked out and they put me in an		
17	ambulance because I was crying. And I don't know who		
18	the person was, but apparently, it was somebody that I		
19	knew because they told me I needed to basically get away		
20	from the scene because they knew that was my family's		
21	church. So they put me in the ambulance and gave me a		
22	bottle of water. That was when I got to talk to		
23	Danny -- to my husband. He came over and talked to me		
24	at that ambulance and told me I shouldn't have been		
25	there but -- I don't know.		
	Pg 47		
1	Q. Did he tell you anything else?		
2	A. He said he was trying to find out where my mom		
3	and Z[Redacted] were taken and as soon as he knew, he would let		
4	me know. And he said that he had called Grandma and my		
5	uncle to come up there and pick me up so that I wasn't		
6	alone.		
7	Q. Okay. Did he tell you anything about your		
8	father?		
9	A. He just said he was sorry.		
10	Q. All right. From where you were in the		
11	ambulance, could you see the church?		
12	A. The ambulance was parked in front of the church		
13	and the side of the ambulance facing the church building		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	14 didn't have windows so from where I was sitting in 15 the -- in the back of the ambulance, I could not see the 16 church.		
47:20-48:10	Pg 47 20 Q. Okay. So what happened next after -- after 21 your husband left? Did he leave you there and go back 22 to help at the church? 23 A. He did. He did. He said they had another 24 patient to transfer. And then somebody came to the 25 ambulance that I was in and said that they needed that Pg 48 1 ambulance to transfer a patient so I got out. And at 2 that point my oldest son had showed up at the church. 3 And they were trying to get everybody -- the law 4 enforcement was trying to get everybody out from in 5 front of the church so they kind of ushered us towards 6 the community building, which is right down the street. 7 So me and my oldest started walking towards the 8 community building and we stopped about halfway there 9 and me and him were talking and he took it really hard, 10 too.		
48:23 (beginning with "Did you")-50:4	Pg 48 23 ..... Did you 24 ever make it to the community building? 25 A. We did, yes. Pg 49 1 Q. Tell me about what happened there. 2 A. A lot of the family members from the members of		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
3	the church were starting to show up at the community		
4	building. A lot of people from the community that heard		
5	what went on had come over to start helping, either		
6	praying with people or a lot of people brought food and		
7	snacks and -- and water and that kind of thing.		
8	All of the reporters had come over and		
9	tried to take over the front of the community building.		
10	I saw several of the girls that were in my youth group,		
11	their families were still members of that church and		
12	so --		
13	Q. What youth group are you talking about?		
14	A. The youth group from that church when I was in		
15	high school.		
16	Q. Oh, okay.		
17	A. The girls that I'd gone to church with there.		
18	Q. Okay. So they started arriving?		
19	A. Yes. And we started hearing different names of		
20	the people that were injured and the ones that didn't		
21	make it.		
22	Q. And -- and who were -- who were you hearing		
23	those names from?		
24	A. Family members. A lot of the family members		
25	that were -- that had family at the church.		
	Pg 50		
1	Q. How long were you there at the community		
2	building?		
3	A. For a while. It was starting to get dark when		
4	I finally left the -- the Sutherland Springs.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
50:21 (beginning with "did you")-50:25	<p>Pg 50</p> <p>21 ..... did you</p> <p>22 then go to the hospital?</p> <p>23 A. I did not because my grandmother was already</p> <p>24 there at that point so she was kind of thinking for me</p> <p>25 and --</p>		
51:6-51:12	<p>Pg 51</p> <p>6 Q. Okay. And you say that they were doing the</p> <p>7 thinking for you. What do you mean by that?</p> <p>8 A. That I was still trying to process everything</p> <p>9 that was going on and Grandma was making sure that I had</p> <p>10 something to eat and I wasn't trying to drive all the</p> <p>11 way from Sutherland Springs to University Hospital where</p> <p>12 my mom was. She was taking care of me.</p>		
52:1-52:3	<p>Pg 52</p> <p>1 Q. Okay. Were there other people that you knew at</p> <p>2 the church that were also victims of the shooting?</p> <p>3 A. Yes, sir.</p>		
52:10-52:24	<p>Pg 52</p> <p>10 Q. Was it your understanding that all of the</p> <p>11 victims had been taken from the scene at that point?</p> <p>12 A. All of the survivors, yes.</p> <p>13 Q. So when were you able to see your mother and</p> <p>14 Z[Redacted]?</p> <p>15 A. The next day I was able to see my mom. I</p> <p>16 wasn't able to see Z[Redacted] the next day. I don't recall if</p> <p>17 she was in surgery or just what -- what the reasoning</p>		

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PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	18 was, but I wasn't able to see Z[Redacted] the next day. 19 Q. And you -- when you saw your mother, what was 20 her condition at that point? 21 A. She was sedated. 22 Q. What is your understanding of her wounds? 23 A. The majority of her wounds were in her hip and 24 leg area and her arm.		
53:11-53:17	Pg 53 11 Q. Okay. Was she sedated the whole time? 12 A. The first day I believe she was, yes. 13 Q. She was not able to talk with you? 14 A. I don't re- -- 15 Q. You want to take a break, ma'am? 16 A. As far as I remember, the first day that I saw 17 her, she wasn't able to talk.		
54:6-55:11 (ending with "wounded.")	Pg 54 6 Q. Okay. Did she tell you anything about what 7 happened inside the church? 8 A. She said that it was all a blur and it was like 9 a nightmare and all she wants to do is forget that it 10 ever happened. 11 Q. Has she ever been able to give you more details 12 than that? 13 A. She doesn't talk about it. 14 Q. What about your brother? 15 A. What about -- what about Bob? 16 Q. Did -- did he ever tell you about what happened 17 inside the church?		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	18 A. Not about what was going on when the shooting 19 was actually happening. We talked about afterwards, 20 after the shooter had left the scene. 21 Q. Do you remember what he told you? 22 A. That he was holding my dad's hand when he took 23 his last breath. 24 Q. Did he tell you about whether your father was 25 able to communicate? Pg 55 1 A. He said that Dad talked to him before he took 2 his last breath -- 3 Q. Okay. 4 A. -- and wanted to know if Mom and Z[Redacted] were okay 5 and Bob told him that they were both taken to the 6 hospital, that they were -- sorry -- that they had both 7 been shot, but that they were on their way to the 8 hospital. 9 Q. When you arrived there and first saw your 10 brother, was he -- was he wounded? 11 A. He was wounded.		
55:12 (beginning with "He was grazed")- 55:13 (ending with "of his head.")	Pg 55 12 ..... He was grazed by a bullet 13 across the top of his head .....		
55:16-57:6	Pg 55		



## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
16	Q. Mentally, what was his condition at the time?		
17	A. He was trying to be strong because I was a		
18	crying, babbling mess.		
19	Q. I understand that there were some memorials at		
20	the church afterward. Did you go to those?		
21	A. Yes, sir.		
22	Q. How many were there?		
23	A. I know there was several different memorials		
24	all through the community. The one that I went to --		
25	the main one that I went to at the church was when they		
	Pg 56		
1	reopened the sanctuary as -- I guess as a memorial to		
2	the victims. We went to that and it was very rough to		
3	go through. And they had chairs set up where each		
4	victim was sitting with the names on the back of the		
5	chairs and walking through and seeing all of the names		
6	of my friends, of my family --		
7	Sorry.		
8	Q. Do you remember when that memorial was?		
9	A. I honestly don't. I know we went the very		
10	first time that they opened it up.		
11	Q. Okay. Did you go to the funerals?		
12	A. I went to a few of the funerals, yes, sir.		
13	Q. Other than your -- your dad's funeral, who		
14	else's did you go to?		
15	A. I went to Peggy Warden's funeral.		
16	Sorry.		
17	I went to the funeral for Joann and her		
18	girls.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	19 Q. Joann who?		
	20 A. Rylan's (phonetic) mother. I can't think of		
	21 her name off -- her last name right now --		
	22 Q. Okay.		
	23 A. -- but the funeral was for her and her two		
	24 daughters.		
	25 I tried to make it to the Holcombe funeral,		
	Pg 57		
	1 but the place where they were having it, it got to		
	2 capacity before we could get in. So I just went back		
	3 home because I knew Karla would rather me not stand		
	4 there and argue with the person at the door about going		
	5 in, she would rather me just go think about her and not		
	6 worry about actually being there.		
57:10-58:24 (ending with "Tuesday")	Pg 57		
	10 Q. Okay. Since that time kind of tell me		
	11 generally how you've been.		
	12 A. I'm sorry, did you say how I've been doing?		
	13 Q. Yes, ma'am.		
	14 A. Just trying to take it day by day. It's		
	15 extremely hard going by the church and remembering all		
	16 of the good times that I had there growing up and all of		
	17 the good times my children have had there, and then		
	18 relating it to the shooting. It's -- it's hard. My		
	19 family's not the same. My life's not the same.		
	20 Q. When you say "your family," who -- who do you		
	21 mean?		
	22 A. My brother and sister and my mom, as far as us		
	23 like a group family unit, I guess.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	24 Q. Okay. So tell me how that's changed. Prior to 25 the shooting, what was your relationship with your Pg 58 1 mother like? 2 A. With my mother? 3 Q. Yes, yes. 4 A. We've always been fairly close. We would do 5 family get-togethers and all of us would just kind of 6 hang out and tease each other and give each other a hard 7 time about just stupid little things. And now we 8 don't -- it's kind of like there's a rift between us 9 now. We still spend time together, we still do the 10 family events, it's just not the same without Dad 11 around. He was kind of the one that brought us all 12 together and -- I guess that's the best way to describe 13 it. He was the one that brought us all together and now 14 that he's not there, it's just no matter how much you 15 try, there's something missing. It's just not the same. 16 Q. So before the shooting how often would you get 17 together with your mother? 18 A. At least once a month. It was usually more 19 often than that, even if it was just to go shopping. 20 Q. Okay. And what about now, how often do you see 21 your mother now? 22 A. Not very often. 23 Q. When was the last time you saw her? 24 A. Tuesday. ....		
59:15-59:18	Pg 59 15 A. I would see her probably weekly beforehand,		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	16 before the shooting. 17 Q. And what about now? 18 A. Now it's more like once a month.		
60:7-60:12	Pg 60 7 Q. Are you still able to go do things like 8 shopping with her? 9 A. It has been a long time since we've gone 10 shopping together. 11 Q. Was it more frequent before the shooting? 12 A. Yes, it was.		
64:8-64:12 (ending with "brat".)	Pg 64 8 Q. Okay. Tell me what your father was like. Tell 9 me about your dad. 10 A. He was a great man. He really was. When I was 11 younger, he was really strict, but I needed it because I 12 was kind of a brat. ....		
66:8-66:17	Pg 66 8 Q. Was your dad working in November 2017? 9 A. Yes, sir, he was. 10 Q. What was he doing? 11 A. He worked for H-E-B. 12 Q. Okay. What did he do at H-E-B? 13 A. He worked in the dairy section. He was a 14 stocker. 15 Q. How long had he been working there? 16 A. Either right at 20 years or over 20 years. 17 He'd been there forever.		

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PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
66:21-67:11	<p>Pg 66</p> <p>21 Q. Okay. Did he have any hobbies, anything he</p> <p>22 liked to do when he wasn't working?</p> <p>23 A. He liked to play with Z[Redacted]. He was thrilled to</p> <p>24 have a little girl around to play with and she adored</p> <p>25 him. They were like this (indicating). They really</p> <p>Page 67</p> <p>1 were.</p> <p>2 Q. How often did they see each other?</p> <p>3 A. At least every other day. They -- they always</p> <p>4 spent time together. They were so close.</p> <p>5 Q. Did he -- did he and your mother spend a lot of</p> <p>6 time together?</p> <p>7 A. Yes, they did.</p> <p>8 Q. Did they share any hobbies or like to do</p> <p>9 anything in particular together?</p> <p>10 A. They loved going camping and gardening. She</p> <p>11 taught Dad how to have a green thumb.</p>		
67:24-68:18 (ending with "father?")	<p>Pg 67</p> <p>24 Q. Did he ever help you do things around your</p> <p>25 house, repair things or anything like that?</p> <p>Pg 68</p> <p>1 A. Yes.</p> <p>2 Q. What kind of stuff did he do there?</p> <p>3 A. He -- one time he told me how to fix my car.</p> <p>4 Q. What was wrong with it?</p> <p>5 A. It was easy stuff. I had to change out the</p> <p>6 spark plugs and -- or the spark plug wires, not the</p>		

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PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	7 spark plugs. 8 Q. Okay. 9 A. And I didn't have them on all the way so the 10 car wasn't acting right. And I called him and I was 11 like, "I need you to fix it, Daddy." He laughed at me 12 and he teased me about that for like three weeks just 13 because I didn't push it in, you know, connect them good 14 enough. 15 Q. Right. 16 A. He loved to tease me. 17 Q. Anything else about your relationship with your 18 father? .....		
68:19 (beginning with "Is there a")-69:22	Pg 68 19 how often you saw him. Is there a time where he had any 20 conflicts? 21 A. Of course. 22 Q. What were those typically like? What were they 23 about? 24 A. As an adult or as a child? 25 Q. As an adult. Pg 69 1 A. The majority of the time, my dad was one that 2 would just tell it like it is. He would tell me, "Look, 3 you're being stupid. You're smarter than this. You 4 know better than this. You need to do what you're 5 supposed to do and you'll be all right." And usually, 6 he was right. 7 Q. Sometimes we all need somebody to say that to 8 us, I guess.		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	9 A. That was the proverbial shaking that I needed.		
	10 Q. Yeah. Okay. What do you miss most about your		
	11 father?		
	12 A. Everything. I miss him being there for me to		
	13 talk to when my kids drive me crazy.		
	14 Q. Is he someone you went to when you were having		
	15 problems with your kids or anything else?		
	16 A. He was. I would talk to him when my oldest boy		
	17 would give me a hard time and he would always come back		
	18 and tell me something stupid that I did as a teenager		
	19 and some of the things he had to deal with me.		
	20 "You remember when you did this and I had		
	21 to deal with it?"		
	22 "I'm sorry, Dad."		
69:25 (beginning with "He would")-70:15	Pg 69 25 ..... He would -- always wanted to joke around and I Pg 70 talk to. 9 Q. What do you mean by that? Tell me a little 10 more about that. 11 A. I've been dealing with a lot of anxiety and 12 depression since the shooting happened and it's really 13 hard because he would help me get through it so much 14 with an issue like that and I don't have him here to 15 help me with it. It's difficult.		
82:11-82:17	Pg 82 11 Q. Okay. Is your life less satisfying as a result 12 of the shooting?		

## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	13 A. Yes, it is.		
	14 Q. In what regard?		
	15 A. Because I don't have Dad to share all my good		
	16 stuff with. He's not there to watch my son walk the		
	17 stage, as an example.		
85:9-87:3	Pg 85		
	9 Q. Okay. Also said in here that you told him you		
	10 feel like you ought to be punished. Tell me about that.		
	11 A. I told -- when I told him that, I was feeling		
	12 like God was punishing me, that I must have done		
	13 something really bad, I don't know, in a past life or		
	14 something like that that I'm being punished for and		
	15 that's why I lost my dad and that's why I lost everybody		
	16 that I loved that was killed at the shooting. It felt		
	17 like a bad dream. It still feels like a bad dream.		
	18 Q. Who else did you lose in the -- in the shooting		
	19 that you loved?		
	20 A. Peggy Warden was my best friend's mom, she was		
	21 another mom to me. Her son Zachary, I've known him		
	22 since he was a baby. He was like another one of my		
	23 kids. I knew a lot of the people up there that were		
	24 killed that day.		
	25 Q. He also indicated that you regret not going to		
	Pg 86		
	1 the church that morning, that Dad asked you to go.		
	2 Did your dad ask you to go to church that		
	3 morning?		
	4 A. He did.		
	5 Q. Okay. Tell me about that.		



## Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	<p>6 A. The weekend before that, I believe, I was on</p> <p>7 the phone with him, we were -- we were laughing about</p> <p>8 renaissance fair and he was teasing me that the costume</p> <p>9 I was going to wear for renaissance fair was</p> <p>10 unacceptable because it showed too much skin and that I</p> <p>11 needed to go to church. And that would have been the</p> <p>12 weekend of November 5th that he was telling me I should</p> <p>13 have gone to church.</p> <p>14 Q. So did he -- did he specifically say, "You need</p> <p>15 go to church this weekend or next weekend"?</p> <p>16 A. He specifically told me that next Sunday, I</p> <p>17 need to have my ass in church.</p> <p>18 Q. Okay.</p> <p>19 A. He was teasing me because I was dressing up</p> <p>20 like Elvira for the renaissance festival we were going</p> <p>21 to.</p> <p>22 Q. Okay. It also says that your father was the</p> <p>23 one person you felt comfortable talking to. And you</p> <p>24 kind of discussed that already.</p> <p>25 Are you not comfortable talking with your</p> <p>Pg 87</p> <p>1 mother or your husband about those things?</p> <p>2 A. It's not the same talking to them as it was</p> <p>3 talking to my dad.</p>		
88:6-88:12	<p>Pg 88</p> <p>6 Q. Do you know when your family first started</p> <p>7 going to that church?</p> <p>8 A. I first started going when I was 13 so probably</p> <p>9 a year or two after is when my family started going.</p>		

Deposition Testimony of Rebecca Metcalf

PAGE & LINE	TESTIMONY	OBJECTION	ADMITTED
	10 Q. Oh, so you were the first one to attend that		
	11 church?		
	12 A. Yes, sir.		

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